

IV RESPONSES TO COMMENTS FROM CITIZENS OF WESTERN COLORADO

1. *Comment: Before a transportation corridor or disposal site is chosen for radioactive waste, agencies must: Examine threats to human health and the environment and adopt technical safeguards. Isolate and stabilize radioactive waste in the best technically feasible manner.*

Response: The ROD presents EPA's decision to ship the Shattuck waste off site to a licensed facility. The ROD does not specify the facility, transportation route and method of transportation. Those decisions will be made as part of the disposal contract procurement process. In response to comments concerning the Umetco facility at Uravan, USEPA must comply with federal law, including Federal Acquisition regulations. These rules and regulations may restrict EPA's ability to legally exclude a specific company or facility from the bidding process. The ability of a facility to accept waste will be determined, in part, through a detailed review of its operating and licensing records. USEPA is keeping all disposal options open to maximize the competitive bidding process.

Licensed waste disposal facilities are sited (list siting requirements) to minimize threats to human health and the environment. Technical safeguards (list examples such as construction, monitoring, inspection, etc.) are required by regulation to ensure short and long-term protectiveness.

There are two major issues regarding transportation in environmental restoration projects: traffic accidents and spills. USEPA recognizes that any time the amount of traffic increases, there is a potential for an increase in accidents. Transportation routes are chosen to minimize potential accidents and drivers are given extra safety training. Support en route, such as flag people, and restricted travel schedules are instituted as necessary. Spill control and emergency hazardous material response procedures would be in place. USEPA coordinates with local agencies to ensure that all reasonable safety measures are taken. All state and federal transportation regulations are strictly followed.

2. *Comment: Solicit concerns of communities and local residents both along the transportation route and at the disposal site, and mitigate conflicts.*

Response: USEPA recognizes the concerns of residents and businesses regarding health and safety issues, property values, tourism, and public perception.

3. *Comment: Ensure disclosure and public participation in decision making.*

Response: USEPA is required under Superfund law to involve the public in the process of selecting and implementing a remedy.

4. *Comment: Encourage long-term storage of radioactive waste close to its present location. The Shattuck waste should be removed from its site and stored as close to Denver as possible to minimize transportation risks.*

Response: The waste will be removed from the Shattuck site and disposed of at a licensed facility. There are no appropriately licensed facilities close to Denver.

5. *Comment: Truck transportation along Highway 141 is likely to cause accidents.*

Response: There are two major issues regarding transportation in environmental restoration projects: traffic accidents and spills. USEPA recognizes that any time the amount of traffic increases, there is a potential for an increase in accidents. Transportation routes are chosen to minimize potential accidents and drivers are given extra safety training. Support en route, such as flag people, and restricted travel schedules are instituted as necessary. Spill control and emergency hazardous material response procedures would be in place. USEPA coordinates with local agencies to ensure that all reasonable safety measures are taken. All state and federal transportation regulations are strictly followed.

6. *Comment: Disposal at the Umetco facility on fractured soils above the San Miguel River is likely to cause contamination releases to the river.*

Response: USEPA completed a five-year review of the Uravan site in March 2000. The purpose of the review was to evaluate whether the remedial actions taken at the site to date remain protective of human health and the environment. The review found that concentrations of radionuclides, metals, or inorganic compounds in the San Miguel River at Uravan have not changed over the past five years and appear to be equivalent at all six sampling locations throughout the Uravan site. This indicates that there is no measurable impact to river water quality by the Uravan facilities and associated remedial activities. Monitoring data indicate that there is no impact from the site on surface water.

7. *Comment: Do not send to Uravan - not suitable.*

Response: USEPA recognizes the concerns of residents and businesses regarding health and safety issues, property values, tourism and public perception.

8. *Comment: The Utah facility is safer, both from rail transportation and from siting on natural clay far from rivers.*

Response: Please see responses to comments 5 and 6 above.

9. *Comment: Utah has more strict regulations governing radioactive waste disposal than Colorado.*

Response: Regulations in all states require that licensed hazardous and radioactive waste disposal sites are protective of human health and the environment.

10. *Comment: Leaving the Shattuck waste where it is may be the best and safest choice.*

Response: The five-year review of the Shattuck site raised concern as to the long-term effectiveness of the remedy over time frames measuring in the hundreds of years. This concern, coupled with the community's and state's discomfort with relying on monitoring and repeated five-year reviews to evaluate the effectiveness of the on-site remedy alternatives (Alternatives 1 and 2) caused USEPA to select off-site disposal.

11. *Comment: Favor the transfer and disposal of Shattuck waste at Umetco. Area residents and businesses understand the material. Transportation of flammable materials is far more hazardous. Area needs jobs.*

Response: USEPA will consider community concerns at potential disposal locations as part of its acquisition strategy.